

William Banks
Foamex, L.P.
3005 Commercial Road
Fort Wayne, Indiana 46809

Re: 003-13909-00225
1st Minor Permit Modification to
Part 70 003-7680-00225

Dear Mr. Banks:

Foamex, L.P., located at 3005 Commercial Road, Fort Wayne, Indiana 46809 was issued a permit on March 22, 1999 for a stationary plant that manufactures polyurethane foam. An application for a preconstruction approval and an approval to operate was received on January 30, 2001. Pursuant to the provisions of 2-7-12 the permit is hereby modified to incorporate the new operation conditions for the following new facilities:

One (1) 9-platen felt press E (ID: FPE), with a maximum capacity to process foam at a rate of 53 sheets per hour, exhausting through stack ID: 51; and one (1) flame laminator ID: FL-03, with natural gas-fired burner rated at 0.35 million British Thermal Units per hour (mmBtu/hr). This laminator has a maximum capacity to process foam at a rate of 3,000,000 square feet per month (ft²/mo), exhausting through stack ID: 02-003).

1. The above new facilities were added in Section A.2 Emission Units and Pollution Control Equipment Summary on Page 6 of 45.
2. The following new section was created (changes are bolded and deletions are struck-through for emphasis):

SECTION D.7

FACILITY OPERATION CONDITIONS

- (8) **One (1) 9-platen felt press E (ID: FPE), with a maximum capacity to process foam at a rate of 53 sheets per hour, exhausting through stack ID: 51; and**
- (9) **One (1) flame laminator ID: FL-03, with natural gas-fired burner rated at 0.35 million British Thermal Units per hour (mmBtu/hr). This laminator has a maximum capacity to process foam at a rate of 3,000,000 square feet per month (ft²/mo), exhausting through stack ID: 02-003).**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Volatile Organic Compounds (VOCs)

Any change or modification which may increase the potential to emit VOC, PM and PM10 greater than minor source threshold, or single HAP to 10 tons per year or greater or combined HAPs to 25 tons per year or greater, as specified in 326 IAC 2-1, based on the stack test required in the Part 70 permit to verify the emission factors shall be subject to New Source

Review and must be approved by the Office of Air Quality (OAQ) before such change can occur.

D.7.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the PM emissions from the following felt presses shall be limited as follows:

Facility	Process Weight Rate (ton/hr)	PM Emissions Limit (lb/hr)
9-Platen felt press E (ID: FPE)	1.065	4.28
Flame laminator ID: FL-03	2.0	6.5

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where : } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirement

D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required by this permit to perform compliance tests. However, the Commissioner reserves the right to invoke its authority under 326 IAC 2-1.1-11 to require stack testing, monitoring or reporting at any time to assure compliance with all applicable requirements. If testing is required by IDEM compliance with Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.4 Record Keeping Requirements

(a) The Permitted shall maintain records in accordance with (1) through (4) below for the above facilities. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with Condition D.7.1.

- (1) The number of polyurethane sheets processed;**
- (2) The weight of the polyurethane foam processed;**
- (3) The total production of laminated foam per month in square feet for the flame laminator;**
- (4) A log of the dates of use; and**
- (5) The weight of VOC emitted for each compliance period.**

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of

this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0
and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - Allen County
U.S. EPA, Region V
Allen County Health Department
Air Compliance Section Inspector - Jennifer Dorn
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Foamex, L.P.
3005 Commercial Road
Fort Wayne, Indiana 46809**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-7680-00225	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: March 22, 1999
1 st Administrative Amendment No.: 003-12211-00225	Issuance Date: May 10, 2000
1 st Minor Permit Modification No.: 003-13909-00225	Pages Affected: 6, 39 Pages Added: 39a, 39b
Issued by: Paul Dubenetzky, Chief Permit Branch Office of Air Quality	Issuance Date: April 30, 2001

FPC), from 211,000 sheets per year to 300,000 sheets per year, exhausting through one (1) stack (ID No. 48).

- (7) The installation of one (1) new 6 sheet felt press D (ID No. FPD), with a foam processing rate of 300,000 sheets per year, exhausting through one (1) stack (ID No. 49).
- (8) One (1) 9-platen felt press E (ID: FPE), with a maximum capacity to process foam at a rate of 53 sheets per hour, exhausting through stack ID: 51.
- (9) One (1) flame laminator ID: FL-03, with natural gas-fired burner rated at 0.35 million British Thermal Units per hour (mmBtu/hr). This laminator has a maximum capacity to process foam at a rate of 3,000,000 square feet per month (ft²/mo), exhausting through stack ID: 02-003).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) polyol storage tanks with VOC emissions less than 3 pounds per hour or 15 pounds per day (one tank has a storage capacity of 30,000 gallons); and
- (2) one (1) 20,000 gallon No. 2 fuel oil storage tank with VOC emissions less than 3 pounds per hour or 15 pounds per day.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.7 FACILITY OPERATION CONDITIONS

- (8) One (1) 9-platen felt press E (ID: FPE), with a maximum capacity to process foam at a rate of 53 sheets per hour, exhausting through stack ID: 51; and
- (9) One (1) flame laminator ID: FL-03, with natural gas-fired burner rated at 0.35 million British Thermal Units per hour (mmBtu/hr). This laminator has a maximum capacity to process foam at a rate of 3,000,000 square feet per month (ft²/mo), exhausting through stack ID: 02-003).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.7.1 Volatile Organic Compounds (VOCs)

Any change or modification which may increase the potential to emit VOC, PM and PM10 greater than minor source threshold, as specified in 326 IAC 2-1, based on the stack test required in the Part 70 permit to verify the emission factors shall be subject to New Source Review and must be approved by the Office of Air Quality (OAQ) before such change can occur.

D.7.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3 (Process Operations), the PM emissions from the following felt presses shall be limited as follows:

Facility	Process Weight Rate (ton/hr)	PM Emissions Limit (lb/hr)
9-Platen felt press E (ID: FPE)	1.065	4.28
Flame laminator ID: FL-03	2.0	6.5

The pounds per hour limitation was calculated with the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where : } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Compliance Determination Requirement

D.7.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required by this permit to perform compliance tests. However, the Commissioner reserves the right to invoke its authority under 326 IAC 2-1.1-11 to require stack testing, monitoring or reporting at any time to assure compliance with all applicable requirements. If testing is required by IDEM compliance with Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.4 Record Keeping Requirements

- (a) The Permitted shall maintain records in accordance with (1) through (4) below for the above facilities. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with Condition D.7.1.

- (1) The number of polyurethane sheets processed;

- (2) The weight of the polyurethane foam processed;
 - (3) The total production of laminated foam per month in square feet for the flame laminator;
 - (4) A log of the dates of use; and
 - (5) The weight of VOC emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Modification

Source Background and Description

Source Name:	Foamex, L.P.
Source Location:	3005 Commercial Road, Fort Wayne, Indiana
County:	Allen
SIC Code:	3086
Operation Permit No.:	T 003-7680-00225
Operation Permit Issuance Date:	March 22, 1999
Minor Permit Modification No.:	003-13909-00225
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a modification application from Foamex, L.P. relating to the operation of the following equipment used in the polyurethane foam production:

- (a) One (1) 9-platen felt press E (ID: FPE), with a maximum capacity to process foam at a rate of 53 sheets per hour, exhausting through stack ID: 51; and
- (b) One (1) flame laminator ID: FL-03, with natural gas-fired burner rated at 0.35 million British Thermal Units per hour (mmBtu/hr). This laminator has a maximum capacity to process foam at a rate of 3,000,000 square feet per month (ft²/mo), exhausting through stack ID: 02-003).

History

On January 30, 2001, Foamex, L.P. submitted an application to the OAQ requesting to add a platen felt press and a laminator to their existing plant. Foamex, L.P. was issued a Part 70 permit on March 22, 1999.

Existing Approvals

The source was issued a Part 70 Operating Permit (T003-7680-00225) on March 22, 1999. The source has since received the following:

- (b) First Minor Source Modification No.:003-12178, issued on May 10, 2000; and
- (a) First Administrative Amendment No.: 003-12211, issued on May 10, 2000.

Recommendation

The staff recommends to the Commissioner that the Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on January 30, 2001.

Emission Calculations

See Page 2 of 6 Source Modification 003-13852 Technical Support Document.

Justification of the Level of Approval

This Minor Permit Modification pursuant to 326 IAC 2-7-12(b) is being issued to incorporate the requirements from a preconstruction permit (Minor Source Modification 003-13852) under 326 IAC 2-7-10.5 that have not satisfied the requirements of 326 IAC 2-7-17 and 2-7-18, and that cannot be implemented under an Administrative Amendment nor a Significant Permit Modification.

County Attainment Status

The source is located in Allen County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60)
See the determination made in the Source Modification 003-13852.
- (b) National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63)
See the determination made in the Source Modification 003-13852.

State Rule Applicability -

See the determination made in the Source Modification 003-13852

Changes to the Part 70 Permit

1. The new facilities were added in Section A.2 Emission Units and Pollution Control Equipment Summary on Page 6 of 45.
2. The following new section was created (changes are bolded and deletions are struck-through for emphasis):

SECTION D.7

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 - (5) The weight of VOC emitted for each compliance period.**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Conclusion

The operation of the proposed platen felt press and flame laminator shall be subject to the conditions of the attached proposed **Minor Permit Modification No. 003-13909-00225**.